

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN REF ) Adv. Proc. Case No. \_\_\_\_\_  
MORRIS SHNIDER WITTSTADT VA., ) Case No.: 15-bk-33370  
PLLC ) Maryland - 15-bk-15573  
----- )  
GENEAN PURYEAR ) Chapter 11  
3102 GLISSADE COURT )  
CLINTON, MD 20735, )  
PLAINTIFF, )  
VS. )  
MORRIS SCHNIDER WITTSTADT VA, )  
MARK H. WITTSTADT, GERALD WM )  
WITTSTADT, HOLLOWAY HILL )  
Virginia Professional limited )  
liability company, et al., )  
AND )  
BANK OF AMERICA )  
AND )  
SAMUEL I. WHITE PC )  
AND )

COMPLAINT FOR DECLARATORY JUDGMENT TO VACATE THE SUBSTITUTE TRUSTEE

APPOINTMENT OF AUGUST 12, 2015 AS VOID - 1

FILED  
2017 FEB 14 A 10:53

1 ATTORNEY EDWARD PORETZ

2 MCCABE, WEISBERG & CONWAY, LLC

3  
4  
5 **COMPLAINT FOR DECLARATORY JUDGMENT TO VACATE THE SUBSTITUTE**  
6 **TRUSTEE APPOINTMENT OF AUGUST 12, 2015 AS VOID, SANCTION, FRAUD**  
7 **ON THE COURT, IMPOSITION OF EQUITABLE LIEN AND/OR CONSTRUCTIVE**  
8 **TRUST, INJUNCTIVE RELIEF**

9 TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

10  
11 COMES NOW, Genean Puryear, and files this Complaint against  
12 MORRIS SCHNEIDER WITTSTADT LLC, MARK H. WITTSTADT, GERALD WM  
13 WITTSTADT, Holloway Hill, Bank of America, Samuel I. White PC,  
14 and Attorney Edward Poretz, Defendants, seeking for declaratory  
15 judgment to vacate the Appointment of Substitute Trustees by  
16 Bank of America to Samuel I. White PC., and would respectfully  
17 show the Court:  
18

19 **A. JURISDICTION**

- 20  
21  
22 1. On April 18, 2015, Plaintiff filed a petition for relief  
23 under Chapter 7 of the Bankruptcy Code under case no.  
24 15-bk-15573. On or about August 4, 2015 the case was  
25 closed and a standard discharge was issued on July 29,  
26 2015.

2. On January 25, 2017, Plaintiff filed a petition for relief under Chapter 13 of the Bankruptcy Code under case no. 17-bk-10947, that's pending before the United States Bankruptcy Court for the District of Maryland.
3. On February 07, 2017, Plaintiff filed a Motion to Reopen Chapter 7 Case, after discovering the fraud.
4. This Court has jurisdiction pursuant to 28 U.S.C. 157(b), 1334 and 2201. This is a core proceeding under 28 U.S.C. 157(b)(2). Plaintiff seeks declaratory judgment in accordance with Rule 7001 of the Federal Bankruptcy Rules of Procedure, Rule 57 of the Federal Rules of civil procedure and 11 U.S.C 105.

**B. Parties and Service**

5. Ms. Puryear is a resident and citizen of the State of Maryland.
6. Mark Wittstadt is a resident and citizen of the State of Maryland and may be served at his place of residence in Cockeysville, Maryland.
7. Gerard Wittstadt, Jr. is a resident and citizen of the State of Maryland and may be served at his place of residence in Elkton, Maryland.
8. MORRIS SCHNEIDER WITTSTADT LLC is a Georgia limited liability company that may be served through its

COMPLAINT FOR DECLARATORY JUDGMENT TO VACATE THE SUBSTITUTE TRUSTEE

1 registered agent, Frederick G. Boynton, at 8200 Roberts  
2 Drive, Suite 200, Atlanta, Georgia 30350. Morris  
3 Schneider Wittstadt LLC principal place of business is  
4 3560 Lenox Road, NE, Suite 3000, Atlanta, Georgia 30326.  
5 Its members and their citizenship are as follows: THE  
6 MORRIS CORPORATION, a Georgia corporation and a citizen  
7 of the State of Georgia that may be served through its  
8 registered agent Frederick G. Boynton, at 8200 Roberts  
9 Drive, Suite 200, Atlanta, Georgia 30350.  
10  
11

12 9. Bank of America is a financial services corporation  
13 headquartered in Charlotte, North Carolina. Bank of  
14 American can be served via their Attorney Samuel I.  
15 White PC, whose address is 611 Rockville Pike Sandy  
16 Spring Bank Financial Center Suite 100 Rockville, MD  
17 20852.  
18

19 10. Attorney Edward Matthew Poretz, is an Attorney with  
20 Morris Hardwick Schneider and LandCastle Title. He can  
21 be served at 6B Nashua Court Baltimore, MD 21221.  
22

23 **C. STATEMENT OF FACTS**

24 11. On August 14, 2014 MORRIS SCHNEIDER WITTSTADT LLC, and  
25 Mark H Wittstadt, Gerald WM Wittstadt and Holloway Hill,  
26 filed a foreclosure case against the Debtor in Prince  
27 George's Circuit Court. Wittstadt vs. Puryear (Case No.  
28

1 CAEF14-22221. See Exhibit "A" (Prince Georges Circuit  
2 Court Docket)

3 12. On August 14, 2014, Morris Hardwick Schneider, LLC filed  
4 an APPOINTMENT OF SUBSTITUTE TRUSTEES, by Bank of  
5 America, N.A. See Exhibit "B" (Appointment of  
6 Substitute Trustees) dated August 14, 2014.  
7

8 13. On June 29, 2015, AMEGY BANK NA sued MORRIS SCHNEIDER  
9 WITTSTADT LLC, alleging it is withholding about \$17  
10 Million, that are owed to AMEGY BANK NA.  
11

12 14. On **July 05, 2015**, MORRIS SCHNEIDER WITTSTADT VA., PLLC,  
13 filed a Chapter 11 Petition in the Eastern District of  
14 Virginia (Richmond) # 15-33370-KLP, that is still  
15 pending before the court. The Atlanta-based law firm  
16 wrote in court documents former majority owner Nathan  
17 Hardwick, who owned 55.5 percent of the firm formally  
18 known as Morris Hardwick Schneider (MHS), used the  
19 firm's accounts for his personal use (including payments  
20 remitted directly to casinos and on account of private  
21 jets and for his girlfriend and family.  
22

23 15. On **June 10<sup>th</sup>, 2015**, **thirty days** after MORRIS SCHNEIDER  
24 WITTSTADT filed their Chapter 11 Petition, Bank of  
25 America N.A. filed a new **Substitution of Trustee** with  
26  
27  
28

COMPLAINT FOR DECLARATORY JUDGMENT TO VACATE THE SUBSTITUTE TRUSTEE

APPOINTMENT OF AUGUST 12, 2015 AS VOID - 5

1 the Clerk of the Circuit Court on **August 26, 2015**. See  
2 Exhibit "C") (File No: 32212).

3  
4 **D. ARGUMENTS**

5 16. Plaintiff contends that the Defendants should be  
6 sanction, and the Bank of America Substitute Trustee  
7 Appointment is void, because it was filed thirty days  
8 after the filing of the Chapter 11 Petition. Bank of  
9 America, which allegedly appointed the substitute  
10 trustee who did not file the Order to Docket foreclosure  
11 was not the record holder of the note and deed of trust,  
12 and did not have the authority to appoint a substitute  
13 trustee without getting permission from the Bankruptcy  
14 Trustee.  
15

16  
17 17. Because the substitute trustee, who Docketed the Order  
18 to Foreclose in Maryland Circuit Court, where MORRIS  
19 SCHNEIDER WITTSTADT. But the actual Foreclosure  
20 Attorney that filed for Relief from Stay where SAMUEL I.  
21 WHITE, without any notice to the Plaintiff. Therefore,  
22 SAMUEL I. WHITE, never gave Plaintiff any notice of the  
23 alleged debt, and never gave her the opportunity to  
24 dispute the debt.  
25

26 18. SAMUEL I. WHITE PC, the substitute trustee, who filed  
27 the motion for relief from stay was not properly  
28

1 appointed, and the alleged Substitute Trustee was  
2 invalid.

3 19. Further, because Bank of America was not the holder of  
4 the note and deed of trust, the loan was not property  
5 accelerated.  
6

7 **WHEREFORE**, Genena Puryear, Plaintiff, prays:

- 8 1. The Court issue a declaratory judgment that the alleged  
9 August 12, 2015 Substitute Trustee Appointment be  
10 stricken from the record and void and title to the  
11 Residence restored to Plaintiff.  
12
- 13 2. Sanction the Attorneys and deny MORRIS SCHNEIDER  
14 WITTSTADT's A DISCHARGE due to fraud on the Court.  
15
- 16 3. Issue an Order vacating All the orders entered in the  
17 Circuit Court of Prince Georges County Maryland.  
18
- 19 4. Order that the Plaintiff First Bankruptcy Case and her  
20 Motion to reopen be grant, in order to file an adversary  
21 Complaint against all the Defendants.  
22
- 23 5. The Court award Plaintiff damages against all defendants.

24 Dated this 07 of FEB, 2017

25 

26 Genena Puryear,  
27  
28

COMPLAINT FOR DECLARATORY JUDGMENT TO VACATE THE SUBSTITUTE TRUSTEE

APPOINTMENT OF AUGUST 12, 2015 AS VOID - 7

36243 492

Exhibit A

LOT NUMBERED NINETTEN (19) IN BLOCK LETTERED "F" IN THE SUBDIVISION KNOWN AS "MARY CATHERINE ESTATES", AS PER PLAT THEREOF RECORDED AMONG THE LAND RECORDS OF PRINCE GEORGE'S COUNTY, MARYLAND IN PLAT BOOK WWW 69 AT PLAT 58.



State of Maryland Land Instrument Intake Sheet

[ ] Baltimore City [X] County: Prince George's

Information provided is for the use of the Clerk's Office, State Department of Assessments and Taxation, and County Finance Office Only.  
(Type or Print in Black Ink Only - All Copies Must Be Legible)

36243

493

Space Reserved for Circuit Court Recording Validation

1	Type(s) of Instruments	(Check Box if addendum Intake Form is Attached)			
		Deed	Mortgage	Other Assignment	Other
2	Conveyance Type	Deed of Trust	Lease	<input checked="" type="checkbox"/> Deed of Appointment	
		Improved Sale	Unimproved Sale	Multiple Accounts	Not an Arms-Length Sale (9)
3	Tax Exemptions	Arms-Length (1)	Arms-Length (2)	Arms-Length (3)	
		Recordation			
		State Transfer			
4	Consideration And Tax Calculations	County Transfer			
		Consideration Amount		Finance Office Use Only Transfer and Recordation Tax Consideration	
5	Fees	Purchase Price/Consideration	\$	Transfer Tax Consideration	\$
		Any New Mortgage	\$	X ( ) % =	\$
		Balance of Existing Mortgage	\$	Less Exemption	\$
		Other	\$	Total Transfer Tax	\$
		Other	\$	Recordation Tax Consideration	\$
		Full Cash Value	\$	X ( ) per \$500	\$
			\$	TOTAL DUE	\$
			\$		
			\$		
			\$		
6	Description of Property SDAT requires submission of all applicable information. A maximum of 40 characters will be indexed in accordance with the priority cited in Real Property Article Section 3-104(g)(3)(i).	District	Property Tax ID No. (1)	Grantor Liber/Folio	Map
		05	05-0295345	30109 / 683	0133
		Subdivision Name	Lot (3a)	Block (3b)	Sec/AR(3c)
		6750	19	F	
		Location/Address of Property Being Conveyed (2)			
		3102 Glissade Court, Clinton, Maryland 20735			
		Other Property Identifiers (if applicable)			
		Water Meter Account No.			
		[X] Residential [ ] Non-Residential			
		Partial Conveyance [ ] Yes [X] No			
7	Transferred From	Doc. 1 - Grantor(s) Name(s)		Doc. 2 - Grantor(s) Name(s)	
		Optimum Title			
		Doc. 1 - Owner(s) of Record, if Different from Grantor(s)		Doc. 2 - Owner(s) of Record, if Different from Grantor(s)	
8	Transferred To	Doc. 1 - Grantee(s) Name(s)		Doc. 2 - Grantee(s) Name(s)	
		Mark H. Wittstadt, Gerard Wm. Wittstadt, Jr.			
		New Owner's (Grantee) Mailing Address			
9	Other Names to be Indexed	Doc. 1 - Additional Names to be Indexed (Optional)		Doc. 2 - Additional Names to be Indexed (Optional)	
10	Contact/Mail Information	Instrument Submitted by Contact Person		[X] Return to Contact Person	
		Name: Mendy Goodman		[ ] Hold for Pickup	
		Firm: Morris   Hardwick   Schneider		[ ] Return Address Provided	
		Address: 9409 Philadelphia Road			
		Baltimore, Maryland 21237 Phone: 410-284-9600			
		11 IMPORTANT: BOTH THE ORIGINAL DEED AND A PHOTOCOPY MUST ACCOMPANY EACH TRANSFER			
		Assessment Information		Will property being conveyed be the grantee's principal residence?	
		Yes [ ] No [X]		Does the transfer include personal property? If yes, describe:	
		Yes [ ] No [X]		Was the property? If yes, attach copy of survey (if recorded, no copy required)	
		Assessment Use Only - Do Not Write Below This Line			
[ ] Terminal Verification [ ] Agricultural Verification [ ] Whole [ ] Part [ ] Tran: Process Verification					
Transfer Number		Date Received	Deed Reference	Assigned Property No.	
Year		Geo	Map	Sub	
Land		Zoning	Grid	Plat	
Buildings		Use	Parcel	Section	
Total		Town Cd	Ex. St.	Ex. Cd.	
REMARKS:					

***Exhibit B***

Clerk of the  
Circuit Court

37366 277

File No.: 32212

2015 AUG 26 PM 12:39

SUBSTITUTION OF TRUSTEE

PR GEO CO MD #89  
THIS SUBSTITUTION OF TRUSTEE, made this 10<sup>th</sup> day of June, 2015,  
by and between Bank of America, N.A. (hereinafter "Current Noteholder"), party of the first part, and  
JOHN E. DRISCOLL, III, JANA M. GANTT, KIMBERLY LANE, LAURA D. HARRIS, E. EDWARD FARNSWORTH, JR., ARNOLD HILLMAN, and DEENA L. REYNOLDS, any of  
whom may individually act, parties of the second part.

WHEREAS, the party of the first part is the present holder of a Promissory Note in the principal amount of \$343,981.00, secured by a deed of trust executed by Genean Puryear and Adrian Puryear, conveying the subject property to **OPTIMUM TITLE**, as Trustee(s), dated September 30, 2008, and recorded on October 29, 2008, in Book No. 30109, at Page 683, among the Land records of Prince George's County, Maryland.

WHEREAS, the Deed of Trust authorizes the holder of the indebtedness secured by the Deed of Trust, at its option, to remove original trustee(s) and appoint substitute trustee(s) and it now being the intent of the current Noteholder to so appoint substitute trustee(s) in place of the original trustee(s) in exercise of the powers set forth therein.

NOW, THEREFORE, the Current Noteholder secured by the Deed of Trust hereinabove referred to, in exercise of the powers under the terms of said Deed of Trust, does hereby appoint JOHN E. DRISCOLL, III, JANA M. GANTT, KIMBERLY LANE, LAURA D. HARRIS, E. EDWARD FARNSWORTH, JR., ARNOLD HILLMAN, and DEENA L. REYNOLDS, any of whom may individually act, as Substitute Trustee, with all the rights, power and duties originally conferred by said Deed of Trust upon the Trustee, Original Trustee(s) or any other Original Trustee(s) or any other subsequently appointed trustee(s) or substitute trustee(s) as aforesaid.

AND FURTHERMORE, the powers enumerated in the Deed of Trust, having been granted to two or more trustees, may be exercised by any one of them, independently of the other(s), or by all acting together for the purpose of the foreclosure action, including but not limited to, any and all pleadings, filings, court documents, or reports mandated by the Maryland Rules and/or local custom and court appearance.

IMP FD SURE \$	40.00
RECORDING FEE	20.00
TOTAL	60.00
Res# FG04	Rcpt # 78534
SJH CDM	Blk # 5346
AUG 26, 2015	12:37 PM

Tax I.D. #05-0295345

37366 278

File No.: 32212

IN TESTIMONY WHEREOF, Bank of America, N.A., has on the 10<sup>th</sup> day of June, 2015, caused the present to be signed by Brandon Lee Rhodes.

**BANK OF AMERICA, N.A.**

By: [Signature] 6-10-15

Name: Brandon Lee Rhodes

Title: Assistant Vice President

STATE OF Pennsylvania  
CITY/COUNTY OF Pittsburgh / Allegheny, to-wit:

I HEREBY CERTIFY that on this 10 day of June, 2015, before me, the subscriber, a Notary Public of the State aforesaid, personally appeared Brandon Lee Rhodes who acknowledges himself to be the Assistant Vice President (title) of Bank of America, N.A., and that he/she, as such officer, being authorized to do so, executed the foregoing instrument for the purposes therein contained by signing, in my presence, the name of said National Association by himself as such officer.

WITNESS my hand and Notarial Seal.

[Signature]

Notary Public

(SEAL)

My Commission Expires:

Feb 10, 2019

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

SHANNON N VARNER, NOTARY PUBLIC  
CITY OF PITTSBURGH, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES FEB. 10, 2019

THIS IS TO CERTIFY that the within instrument was prepared by or under the supervision of the undersigned, an Attorney duly admitted to practice before the Court of Appeals of Maryland.

[Signature]  
Robert A. Jones, Esquire

**AFTER RECORDATION RETURN TO:**

Samuel I. White, P.C.  
5040 Corporate Woods Drive, Ste 120  
VA Beach, VA 23462

Tax I.D. #05-0295345



## **Exhibit C**

36243 490

Clerk of the  
Circuit Court

Return to:  
Morris|Hardwick|Schneider, LLC  
9409 Philadelphia Road,  
Baltimore, Maryland 21237

2014 AUG 14 AM 11:28

PR GEO CO MD #90

**APPOINTMENT OF SUBSTITUTE TRUSTEES**

This Appointment of Substitute Trustees made this 12<sup>th</sup> day of June, 2014, by Bank of America, N.A. who hereby designate and appoint Mark H. Wittstadt and Gerard Wm. Wittstadt, Jr. as Substitute Trustees (each of whom may act independently of the other) in the place and stead of Optimum Title as Trustee.

WHEREAS, under a certain Deed of Trust, executed by Adrian Puryear and Genean Puryear dated September 30, 2008 and recorded among the Land Records of Prince George's County, Maryland in Liber 30109, Folio 683, the hereinafter described property was conveyed to Optimum Title as Trustee, to secure a Note of even date therewith on the following secured property, to wit:

**FOR LEGAL DESCRIPTION SEE ATTACHED EXHIBIT A**

WHEREAS, the Deed of Trust provides that the Noteholders shall have the right and power to substitute one or more of the Trustees in place of the original Trustee named in the said Deed of Trust.

NOW, THEREFORE, Bank of America, N.A., the current holder(s) of the Note described herein and secured by the aforesaid Deed of Trust and in exercise of the powers contained in the said Deed of Trust do hereby nominate, designate and appoint

IMP FD SURE \$	40.00
RECORDING FEE	20.00
TOTAL	60.00
Rest# PG05	Rest # 63668
MMB NNR	BLK # 3554
AUG 14, 2014	11:22 am

36243 491

MARK H. WITTSTADT and GERARD WM. WITTSTADT, JR. as substitute trustees in the place and stead of Optimum Title with all powers, rights, duties and authority of the superseded Trustee.

WITNESS the hands and seals of the said Noteholders.

Bank of America, N.A.

By: Marquita Abbott

Name: Marquita LaRae Abbott

Title: Assistant Vice President (AVP)

Date: 6/12/2014

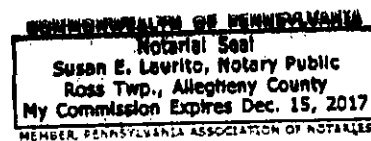
State of Pennsylvania

City/County Pittsburgh/Allegheny

On this 12<sup>th</sup> day of June, 2014, before me, the undersigned officer, personally appeared Marquita LaRae Abbott who is the AVP of Bank of America, N.A. (Noteholder), known to me (or satisfactorily proven) to be the person whose name is subscribed to the within Deed of Appointment of Substitute Trustees and acknowledged he/she executed same in his/her capacity as AVP for the purposes therein contained.

In witness hereof I hereunto set my hand and official seal.

Susan E. Laurito  
NOTARY PUBLIC  
My Commission expires: 12/15/17



**Exhibit D Statement of Docket**



## Case Information

Court System: **Circuit Court for Prince George's County - Civil System**  
Case Number: **CAEF14-22221**  
Case Description: **Wittstadt vs Puryear**  
Case Type: **Property**  
Filing Date: **08/14/2014**  
Case Status: **Active Status**

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## Defendant/Respondent Information

Party Type: **Defendant** Party No.: **2**  
Name: **Adrian Puryear**  
Address: **3102 Glissade Court**  
City: **Clinton** State: **MD** Zip Code: **20735**  
Party Type: **Defendant** Party No.: **3**  
Name: **Genean Puryear**  
Address: **3102 Glissade Court**  
City: **Clinton** State: **MD** Zip Code: **20735**

## Attorney Information

Name: **Edward M Poretz**  
Attorney Type: **Attorney**  
Address: **9409 Philadelphia Road**  
City: **Baltimore** State: **MD** Zip Code: **21237**

## Other Party Information

Party Type: **Substitute Trustee** Party No.: **1**  
Name: **Mark H. Wittstadt, Gerald Wm Wittstadt, Holloway Hill**

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## Dockets

(Each Document listed. Documents are listed in Document No./Sequence No. order)

Date: **08/14/2014**  
Document Name: **CaseType: Foreclos of Deed Tr**  
Docket Text:

---

Date: **08/14/2014**  
Document Name: **Forclsure Eligible for Mediatn**  
Docket Text:

---

Date: **08/14/2014**  
Document Name: **Order To Docket Foreclosure Fd**  
Docket Text: **001 proceeding to forc d/t on liber 30109 folio 683 and liber 33209 folio 174 w/ attachments - fd als e 08-15-14**

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Date: **08/14/2014**  
Document Name: **Forclosure/Prel Loss Mitgtn Aff**  
Docket Text: **002 als e 08-15-14**

---

Date: **08/14/2014**  
Document Name: **Bond Approved and Filed.**  
Docket Text: **003 bond no 146254 - fd als e 08-15-14**

---

Date: **08/28/2014**  
Document Name: **Affidavit of Service, fd**  
Docket Text: **004 Served Genean Puryear on 8/21/14, fd shp e 9/4/14**

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Date: **08/28/2014**  
Document Name: **Affidavit of Service, fd**  
Docket Text: **005 Served Adrian Puryear on 8/21/14, fd shp e 9/4/14**

---

Date: **09/15/2014**  
Document Name: **Deed of Appt/Appt of Sub Tr Fd**  
Docket Text: **006 fd,amk e 09-17-14**

---

Date: **10/07/2015**  
Document Name: **Affidavit, Fd.**  
Docket Text: **007 affidavit of filing of the vacant property registration form w/ line fd./emt364 e 10-9-15**

---

Date: **12/14/2015**  
Document Name: **Forclosure/Mot Req for Mediatin**  
Docket Text: **008 fd,amk**

---

Date: **12/09/2015**  
Document Name: **Forclosure/Finl Loss Mitgtn Aff**  
Docket Text: **009 fd,amk e 12-22-15**

---

Date: **02/05/2016**  
Document Name: **Forclosure/Med Comp No Agrmnt**  
Docket Text: **010 fd,amk**

---

Date: **02/08/2016**  
Document Name: **Forclosure/Mediation Reprt Recd**  
Docket Text: **011 fd,amk**

---

Date: **02/19/2016**  
Document Name: **Order of Court, filed**  
Docket Text: **012 Order of Court dated 02/17/16, Judge Davey, Ordered, that the secured party may schedule the foreclosure sale, subject to the right of the borrower to file a motion pursuant to rule 14-211 to stay the sale and dismiss the action,fd,amk cc e poretz esq, a puryear, g puryear**

Bankruptcy Case No. 15-bk-33370

Adversary Proceeding No.

### CERTIFICATE OF SERVICE

I, Genean Puryear, certify that I am, and at all times during the service of process was, not less than  
(name)  
18 years of age and not a party to the matter concerning which service of process was made. I further certify that the service of this  
summons and a copy of the complaint was made February 13, 2017 by:  
(date)

☒ Mail service: Regular, first class United States mail, postage fully pre-paid, addressed to:

☐ Personal Service: By leaving the process with defendant or with an officer or agent of defendant at:

☐ Residence Service: By leaving the process with the following adult at:

☐ Certified Mail Service on an Insured Depository Institution: By sending the process by certified mail addressed to the following officer of the defendant at:

☐ Publication: The defendant was served as follows: [Describe briefly]

☐ State Law: The defendant was served pursuant to the laws of the State of \_\_\_\_\_,  
as follows: [Describe briefly] (name of state)

Under penalty of perjury, I declare that the foregoing is true and correct.

13 February 2017

Date

\_\_\_\_\_  
Signature

<b>Print Name</b>		
Genean Puryear		
<b>Business Address</b>		
Clinton		
<b>City</b>	<b>State</b>	<b>Zip</b>
CLINTON	MD	20735